

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
ONE MANHATTAN WEST
NEW YORK, NY 10001

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

FIRM/AFFILIATE OFFICES

BOSTON
CHICAGO
HOUSTON
LOS ANGELES
PALO ALTO
WASHINGTON, D.C.
WILMINGTON

BEIJING
BRUSSELS
FRANKFURT
HONG KONG
LONDON
MUNICH
PARIS
SÃO PAULO
SEOUL
SHANGHAI
SINGAPORE
TOKYO
TORONTO

DIRECT DIAL
(212) 735-2588
DIRECT FAX
(917) 777-2588
EMAIL ADDRESS
JESSICA.DAVIDSON@SKADDEN.COM

September 20, 2024

VIA ECF

The Hon. Renée Marie Bumb
Chief United States District Judge
District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No.
1:19-md-2875-RBK-KMW (D.N.J.)

Dear Chief Judge Bumb:

Per the Court's instruction at the September 17 hearing, the ZHP Defendants have compiled examples (attached at Appendix A) of ZHP witness deposition excerpts designated by plaintiffs that include references to the NDMA/NDEA impurities in valsartan as (among other things) genotoxic, mutagenic, carcinogenic and/or linked to the development of tumors and cancer. These designations reflect the centrality of carcinogenicity to plaintiffs' planned trial presentation.

Please let us know if you have any questions or would like additional examples.

As also discussed with the Court, counsel for Teva will separately be submitting on behalf of defendants a short letter brief addressing the anticipated opinions of defense cancer biologist Dr. Lewis Chodosh on the issue of cancer risk.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jessica Davidson".

Jessica Davidson

cc: All counsel of record (via ECF)